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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGINA CASTRO,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, CHAD
MELTON, and DOES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-02810-WLH-MARx

**RESPONSE TO OSC AND
STIPULATION TO CONTINUE
OSC RE DISMISSAL**

OSC re Dismissal:
Date: January 17, 2025
Time: 1:00 p.m.

Proposed Cont. OSC re Dismissal:
Date: April 25, 2025
Time: 1:00 p.m.

1 IT IS HEREBY STIPULATED by and between Plaintiff, REGINA CASTRO
2 and Defendants, COUNTY OF LOS ANGELES, and CHAD MELTON, by and
3 through their counsel of record, to continue the OSC re Dismissal currently
4 scheduled for January 17, 2025 (Dkt. 48), subject to approval by the Court. The
5 parties submit that, as outlined below, GOOD CAUSE exists for this continuance.

6 1. The Parties participated in a mediation on December 15, 2023, with
7 mediator Judge Joseph Biderman (Ret.).

8 2. On December 27, 2023, the Parties filed their Joint Status Report
9 Regarding Conditional Settlement of Entire Action and Request to Continue and/or
10 Vacate all Dates. (Dkt. 44).

11 3. On December 27, 2023, the Court set an Order to Show Cause re
12 Dismissal for March 22, 2024 and vacated all dates and deadlines. (Dkt. 45).

13 4. On February 27, 2024, Plaintiff and her counsel signed the Release in
14 Full Settlement and Compromise Agreement.

15 5. On March 6, 2024, the Parties filed their Response to OSC and
16 Stipulation to Continue OSC re Dismissal, whereby the County estimated that the
17 approval process will take approximately nine (9) months. (Dkt. 46).

18 6. On March 18, 2024, the Court continued the OSC re Dismissal to
19 January 17, 2025. (Dkt. 48).

20 7. The settlement is subject to the County's approval process, which
21 entails final approval by the Contract Cities Claims Board and the County of Los
22 Angeles Board of Supervisors. The approval process is underway, but it is expected
23 to take another several months to complete.

24 8. Once the LASD completes its internal review of a matter, it forwards
25 its required documentation to the LASD Risk Management Bureau and the CEO of
26 Risk Management for Los Angeles County for review. Upon the concurrence of the
27 CEO of Risk Management for Los Angeles County, the documentation is processed
28 through the LASD chain of command. Once the final signature process for LASD is

1 complete, the documentation is provided to the CEO of Risk Management for Los
2 Angeles County for final review and signature, at which time the matter can be
3 placed on the Contract Cities Claims Board agenda. After approval by the Contract
4 Cities Claims Board, the matter will then be placed on the Public Safety Cluster
5 Review agenda, which is typically within 30 days. After the Cluster Agenda has
6 been advised of the settlement, the matter will go before the County Board of
7 Supervisors for approval, which is typically within 30 days.

8 9. Based on defense counsel's understanding and belief, the Los Angeles
9 County Sheriff's Department Risk Management Bureau has been restructured,
10 which created a further backlog of matters awaiting settlement approval. Along
11 with the restructuring was the implementation of a new format and structure for
12 documentation required for a matter to proceed to the Contract Cities Claims Board
13 for settlement approval.

14 10. The Contract Cities Claims Board meets once a month, typically on the
15 second Wednesday of the month. It is expected that this matter will be on the
16 Contract Cities Claims Board Agenda in or around April 2025. If the Settlement is
17 approved by the Contract Cities Claims Board, it is expected that it will be on the
18 Board of Supervisors Agenda within 45 days and, if approved by the Board of
19 Supervisors, that Plaintiff will receive the settlement funds within 45 days of the
20 final approval.

21 11. If the Settlement is approved, the Parties will file a stipulation to
22 dismiss the entire action with prejudice within ten days of Plaintiff's receipt of the
23 settlement funds.

24 12. Therefore, the Parties respectfully request the Court continue the OSC
25 re Dismissal from January 17, 2025, to April 25, 2025, and further respectfully
26 request the Court to maintain jurisdiction over the case pending the approval of the
27 settlement.

28 IT IS SO STIPULATED.

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2 DATED: January 6, 2025

LAW OFFICES OF DALE K. GALIPO

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4 By: /s/ Shannon Leap
5 Dale K. Galipo, Esq.
6 Marcel F. Sincich, Esq.
7 Shannon J. Leap, Esq.
8 *Attorneys for Plaintiff* REGINA CASTRO

9
10 DATED: January 6, 2025

CARPENTER, ROTHANS & DUMONT

11 /s/ Jill Williams
12 By: _____
13 Jill Williams
14 Scott J. Carpenter
15 *Attorneys for Defendant* COUNTY OF LOS
16 ANGELES

17
18 DATED: January 6, 2025

SEKI, NISHIMURA & WATASE, PLC

19
20 By: /s/ Janet Keuper
21 Janet L. Keuper
22 *Attorneys for Defendant* CHAD MELTON
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